

MEMO ENDORSED

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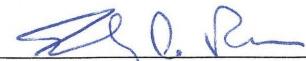
June 8, 2022

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Sentencing is adjourned to August 3, 2022 at 4 p.m.

SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: 6/10/2022

New York, New York

**Re: *United States v. Edward Mercedes*
a/k/a "Pablo Perez Garcia"
19 Cr. 264 (ER) & 22 Cr. 186 (ER)**

Dear Judge Ramos:

Please recall that I represent Mr. Edward Mercedes in the above-referenced matters. Mr. Mercedes is presently scheduled to be sentenced before Your Honor on June 30, 2022 at 11:00 a.m. For the reasons that follow, I write to respectfully request that Your Honor grant a 30-day adjournment of the sentencing hearing. This is the defense's second sentencing adjournment request. I have discussed this request with A.U.S.A. Daniel Nessim, and the Government has no objection.

The parties have not yet received the final draft of the United States Probation Presentence Report (PSR). Once the final PSR is received, the defense will require time to review it with Mr. Mercedes in detail. Mr. Mercedes is detained at the Metropolitan Detention Center (MDC), which causes some hardship in access to him because the MDC has suspended all in-person visitation and, as recently as yesterday, June 7, 2022, has been cancelling legal calls because of another lockdown. In addition, the requested adjournment would enable the defense to work with Mr. Mercedes in preparing his sentencing memorandum prior to submitting it to the Court.

Therefore, I respectfully request a 30-day adjournment of Mr. Mercedes' sentencing hearing and VOSR hearing. Further, I respectfully request that the due dates for the parties'

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respective sentencing submissions be adjusted to correspond with Mr. Mercedes' anticipated new sentencing date and in accordance with Your Honor's Rules.

Thank you for your consideration of this request.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Daniel Nessim (via ECF)
U.S.P.O. Christopher Paragano (via ECF)
Mr. Edward Mercedes (via mail)